

UNITED STATES DISTRICT COURT

for the Southern

District of

Georgia

Augusta Division

2023 SEP 12 A 11:30

CLERK 2B. W. [Signature]

Case No.

CV123-0131

(to be filled in by the Clerk's Office)

Daniel Reeves

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

David Huguenin, Attorney
Pat Goodwin, Realtor
Fountain Law Firm
Shannon Rollins Real Estate

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Daniel Reeves
Street Address	411 36th St Unit 7035
City and County	Augusta, Richmond
State and Zip Code	GA 30909
Telephone Number	912-222-2361

E-mail Address

dreev4176@yahoo.com**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1

Name	David Huguenin
Job or Title (<i>if known</i>)	Attorney
Street Address	4070 Columbia Road
City and County	Martinez Columbia
State and Zip Code	GA 30907
Telephone Number	706-855-5000
E-mail Address (<i>if known</i>)	

Defendant No. 2

Name	Pat Goodwin
Job or Title (<i>if known</i>)	Realtor
Street Address	1202 Town Park Lane Suite 202
City and County	Evans. Columbia
State and Zip Code	GA
Telephone Number	706-829-1343
E-mail Address (<i>if known</i>)	

Defendant No. 3

Name	Fountain Law Firm
Job or Title (<i>if known</i>)	Attorneys
Street Address	336 Georgia Ave
City and County	North Augusta
State and Zip Code	SC 29841
Telephone Number	803-341-9081
E-mail Address (<i>if known</i>)	

Defendant No. 4

Name	Shannon Rollins Real Estate
Job or Title <i>(if known)</i>	Realtor
Street Address	339 West Avenue
City and County	North Augusta. Aiken
State and Zip Code	SC 29841
Telephone Number	803-278-1818
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

Federal question

Diversity of citizenship ☒ X

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

that List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution are at issue in this case.

Civil Rights Act of 1964 and all laws pertaining to ownership of private property. Violation of the 1st Amendment.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

(name) The plaintiff, , is a citizen of the
State of (name)

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

b. If the plaintiff is a corporation

(name) The plaintiff, _____, is incorporated
under the laws of the State of (name) _____,
and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

(name) The defendant, (name) _____, is a citizen of
the State of (name) _____. Or is a citizen of
(foreign _____
nation)

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated
under _____
the laws of the State of (name) _____, and has its
principal place of business in the State of (name) _____.
Or is incorporated under the laws of (foreign nation) _____,
and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

at The amount in controversy—the amount the plaintiff claims the defendant owes or the amount
stake—is more than \$75,000, not counting interest and costs of court, because (explain):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

SEE ATTACHED NARRATIVE FOR STATEMENT OF CLAIM

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

SEE ATTACHED NARRATIVE FOR RELIEF.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

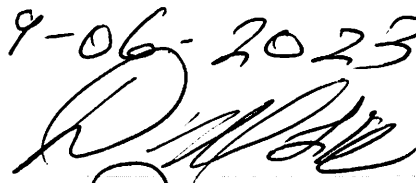
I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Date of signing: 09-06-2023

Signature of Plaintiff

Printed Name of Plaintiff


DANIEL REEVES

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

CONTINUED FROM ITEM II B. , PRO SE 1 - BASIS OF JURISDICTION

A. The Defendant's name is Pat Goodwin of Blanchard and Calhoun Realty and she is a citizen of the State of Georgia

B. The Defendant's name is David Huguenin and he is an Attorney and citizen of the State of Georgia

C. The Defendant's Corporation name is Fountain Law and this Corporation is located in North Augusta, South Carolina.

D. The Defendant's Corporation name is Shannon Rollins Real Estate and this Corporation is located in North Augusta, South Carolina.

CONTINUED FROM ITEM III, PRO SE 1 - STATEMENT OF CLAIM

I am claiming that Pat Goodwin and David Huguenin mislead, misinformed, misdirected and lied about Ingrid Espina being available to sign an agreement to construct an access road on her property at closing and to nullify easement on my property at 2914 Mock Road. Pat Goodwin lied about Ingrid Espina showing up at a later date to sign agreement when she did not show for closing on April 28, 2023.

David Huguenin avoided me so that he would not have to explain the complexities of easements and the fact that he and Pat Goodwin were lying about Ingrid Espina signing agreement to construct access road in order to nullify easement on my property at 2914 Mock Road. Furthermore, **Pat Goodwin and David Huguenin perpetrated a land grab of my property** and gave it to Ingrid Espina claiming that Ingrid Espina would build an access road on her property, at 2912 Mock Road in order to nullify easement on my property, 2914 Mock Road. Attorney David Huguenin's Office made the land grab legal/official on April 28, 2023. But, Mr. Huguenin was conspicuously absent on that date to claim plausible deniability even though he knew about the problem on March 7, 2023 and has avoided me ever since that date.

Fountain Law made errors when closing for Ingrid Espina as iterated by Steve Rushing, Attorney. Fountain Law firm did not ensure Ingrid Espina would construct a road for her own use during closing of 2912 Mock Road on Feb 23, 2023. To my knowledge, Fountain Law Firm also did not forward my letter(English and Spanish) to Ingrid Espina nor did they communicate to me that the letter was delivered.

Now, Shanon Rollins Realtor(D. Padilla) is offering to sell Dale Reeves 2912 Mock Road for \$86k which increased \$21k from an appraisal value of \$65k 6 months before. This is an increase of about 32% which appears to be price gouging of Real Estate to a Bi-Racial Asian Male who is a Georgia Air National Guard Veteran and U.S. Army Civilian Employee.

Pat Goodwin, David Huguenin, Fountain Law, and Shannon Rollins Realtor used the power of their office's to censor, and prevent discussions and communications between Daniel Reeves, 2914 Mock Road owner and Ingrid Espina, 2912 Mock Road Owner as it pertains to signing agreements and to nullify easement on my property at 2914 Mock Road.

All of these entities did not put forth a good faith effort to ensure easement was nullified and agreements were signed by Ingrid Espina after closing. Nor did they provide directions and instructions to me, Daniel Reeves, the Plaintiff on how I should maintain the property until it was occupied by Ingrid Espina as indicated in my June 2023 letter to David Huguenin and Pat Goodwin. All of this was a charade to make a sale. It was the ultimate betrayal by my Real Estate Agent, **Pat Goodwin and Attorney David Huguenin of a military veteran who served with honor and distinction. The actions by all of these entities could be misconstrued as discriminatory and prejudicial treatment of an elderly veteran with targeted disabilities incurred in service and of his cultural and racially diverse family. I also perceive their actions to be Anti-American/Anti-Veteran.**

DANIEL REEVES

CIVIL SUIT

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Also, the price gouging of Real Estate by Shannon Rollins Real Estate of Dale Reeves could be considered discrimination of a Bi-Racial Asian Male My wife is an immigrant from South Korea and my adult children are bi-racial. They have been bullied and harassed because of their race while attending k-12 school in South Georgia. My wife was also mistreated in the work place because of her speech patterns and her race.

Moreover, seeking justice for the mistreatment and abuse of veterans and anti-asian hate is almost impossible due to our Government not recognizing the Civil Rights of Veterans and Asians. Asians are considered the silent minority and they systematically persecuted throughout the nation with little support from government law enforcement agencies.

The wrongdoing of these business entities have metastasized and worsened over this period March 2023 until present and Licensed Professional Real Estate Attorney's and Licensed Real Estate Agents are at fault. They have caused injury and psychological harm to me, Daniel Reeves, The Plaintiff as I progressed on the Home loan conveyor belt. **This process was very stressful causing me to worry(bad dreams)about someone being injured while traversing the easement on my property and subsequently being sued for the mishap. This has worsened my anxiety and depression and nightmares have returned like occurred when I was on alert from a constant threat of a North Korean invasion into South Korea.**

In addition, I allege, Pat Goodwin of Blanchard and Calhoun, Attorney David Huguenin and Shannon Rollins Realtor of Augusta, GA to include Fountain Law in North Augusta, SC maybe guilty of shutting out an honorably discharged U.S. Air Force veteran and members of his cultural and racially diverse family from legal and authorized communication between neighbors(Daniel Reeves & Ingrid Espina).

Lastly, I believe Ingrid Espina was unaware of the pitfalls and consequences of not having her own access road on her property and having to use my property at 2914 Mock Road to access her own residence. The closing team(Shannon Rollins and Fountain Law) in North Augusta did not fully explain the complexities of having unimproved access road easement on someones else's property which could have caused injury and harm to both owners, Ingrid Espina and Daniel Reeves.

The Real Estate Industry and Attorneys are locking veterans(including working and middle class U.S. Citizens) out the housing marketing for accepting cash sales of Real Estate from anyone and everyone to include drug and human traffickers, MS-13, the Russian Mob, members of the CCP and the criminal cabal located in Atlanta. Unfortunately, many of our politicians in Georgia's State Capital are most likely linked to these criminal entities resulting in our safe communities becoming infested with more and more criminal activity. These criminal entities will spread throughout the State of Georgia and will make our small communities(like mine at 2914 Mock Rd) in Augusta less safe. But the government, attorneys, corporations, and real state industry are not concerned about public safety because of their own sinister thirst for wealth, power and status.

Also, Anti-American Global investment firms like BlackRock Vanguard and Wall Street are gobbling up real estate at an accelerated pace which is displacing veterans as wells as working and middle class Americans from affordable housing. All of these things are treasonous, discriminatory, and illegal. Therefore, working and middle class do not have equal access to affordable housing which may violate the 14th Amendment under the U.S. Constitution which states that All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the state wherein they reside. No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any state deprive any person of life, liberty, or PROPERTY, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

I, Daniel Reeves, therefore submit to the court that a Private Corporations should not be considered a person and that families like mine should be given top priority to invest in private property and single family housing as we cannot compete with cash sales from Wall Street, Multinational Corporations, Investment firms to include criminal and foreign entities which are supported by licensed attorneys. I believe the original intent of the law was to grow and sustain the American middle class and not to increase the wealth of ultra-rich multi-national corporations. These Multinational Corporations with their army of attorneys are locking out veterans, minorities and middle class Americans from purchasing affordable housing. Misidentifying a Corporation as a person is contrary to purpose and intent of the 14th amendment under the U.S. Constitution.

As a U.S. Air Force Veteran, I'm asking for compensation for me and my family for mistreatment, abuse, and utter contempt by all defendants as I have dedicated 34 years of my life service to serve in the military and federal service to protect and defend the U.S. Constitution and not to be mistreated by my own people(U.S. Citizens) in the real estate industry.

CONTINUED FROM ITEM IV PRO SE 1. - RELIEF

I am claiming \$300K to compensate for grueling process of house buying where a cabal of Attorney's, Real Estate Agents., and Loan Officers colluded to scheme, lie, and deceive in order to lead me, the Plaintiff to closing regardless of the harm or injury that may occur to owners of both properties now or in the future. I trusted in their professionalism to do the right thing but they betrayed me.

Having an easement of my property to accommodate my neighbors access to their own property is an accident waiting to happen. If a tree, limb or other unknown incident/accident results in my neighbors injury or fatality while traversing the easement on my property, I could be sued for a minimum \$250k to compensate for hospitalization, pain and suffering to my neighbor. Furthermore, the access easement road on my property is unimproved and on a steep grade which increases the potential for accidents for anyone traversing this road to access the single wide trailer residence at the top of the hill.

A Licensed Professional Real Estate Agent and Licensed Professional Attorney had the knowledge, skills and abilities to be keenly aware of these occurrences but did nothing to help explain this to both property owners, Daniel Reeves and Ingrid Espina and to the original owner, Millie Moore. It should be noted Daniel Reeves is an elderly disabled U.S. Air Force Veteran, Millie Moore is Hispanic, and Ingrid is hispanic who does not speak English. We are all protected classes of citizen and we were duped by all of the defendants listed in this complaint. This could be misconstrued as discriminatory and prejudicial treatment of minorities as well as elderly disabled veteran who is married to naturalized immigrant from South Korea. In addition, the defendants did not try to mitigate the issue by bringing us together for Ingrid Espina to sign an agreement to construct an access road and to sign a release of liability. In fact, they did the exact opposite. They went to great lengths to keep Ingrid Espina and I from communicating.

After filing complaints with the Georgia Real Estate Commission and State Bar, I was finally informed that Ingrid Espina wanted to sell the property at 2912 Mock Road that does not have an access road for it's own use but instead uses my property at 2914 Mock Rd to access the single wide trailer at the top of the Hill. The access road easement of my property is unimproved and has a steep grade.

For the past 6 months, The property and easement appeared to be abandoned. Since my ownership of 2914 Mock Road, I have been maintaining the easement and a portion of 2912 Mock, owned by Ingrid Espina, by cutting grass and picking up limbs. The easement has been closed off and I have been the only one using it and maintaining it. I believe David Huguenin and Pat Goodwin knew that Igrid Espina would not be moving here but scammed me into believing she would and that she would be available for April 28, 2023 closing. But, suddenly things changed right before closing and Ingrid Espina's move to 2912 Mock Road was delayed for unknown reasons.

But, I believe this was all contrived to make a sale! Even Millie Moore, original owner who sold both properties to Ingrid and I knew something was not right. She believed that Ingrid Espina would not reside at 2912 Mock Road for very long or not at all. I'm certain all(Real Estate Agents and Attorneys) involved knew this as well. Yes, Shannon Rollins offered to sell 2912 Mock Road to my son, Dale Reeves for an inflated price of \$86K which is \$21K over appraisal price of \$65k 6 months ago when **Pat Goodwin David Huguenin perpetrated a land grab from me which was given to Ingrid Espina during the negotiation process.** Everything in this country is inflated to include housing which will make it difficult for most working and middle class Americans to make ends meet. The current state of the economy will eventually thrust them as well as my family into state of despair and impoverishment because of an unfair, discriminatory and overpriced housing market.

After all of the shenanigans fostered and supported by Real Estate Agents and Attorneys, \$300k is a reasonable request. This will somewhat compensate me for the manner in which the Real Estate Industrial Complex to include closing attorney's conducts business. Due to their business model, Real Estate Agents do not receive payment unless they make a sale and there is little interest in them knowing who(drug and human trackers or Illegal immigrant) they sell to(Money is the only thing that matters in this business) which will lead to more people from foreign countries taking the place of American citizens and veterans like myself. It also will force the price of housing upward with no end in sight.

In addition, there is a free flow of money from foreign governments throughout the state who are involved in criminal activities obtained from human and drug trafficking and other illegal activities. The free flow of money from criminal activity is making up more and more of the economy in this state because the Governor, State Bar, the Georgia Real Estate Commission and other Corporate business's only care about the economy(**whether legal or illegal**)and their self-interest instead of working for the citizens of Georgia to ensure they have affordable housing.

It should be noted, The access easement road was originally intended to accommodate a family member of the original owner, Millie Moore and not for people who were not a family member of both properties, 2912 and 2914 Mock Road. Now, This is causing potential property disputes between Ingrid Espina and Daniel Reeves due to the Real Estate Industries(Blanchard and Calhoun in Augusta) greed for profits. **Pat Goodwin, David Huguenin , Fountain Law, and Shannon Realty placed their own self interest ahead of the interest of Daniel Reeves, Ingrid Espina, and Millie Moore who were and are private property owners and are also protected classes of citizens(Hispanic, Bi-Racial Asian, and elderly Disabled Veteran).**

Furthermore, The sale of Real Estate to the criminal element is taking place every day in Georgia(and throughout the nation) to accommodate the expeditious and immediate transformation of America which is supported by American Politicians and Government/Corporate Institutions in Atlanta.

In order to protect families like mine, I believe state legislators should pass a law that does not allow the sale of real estate with this type of access road easement(hundreds of feet long)when adjacent property has available land(Flagpole Property) to build a road for its own access(platt indicates verifiable evidence) This indicates negligence on the part of Real Estate Agents and Attorneys which appears to be supported by elected Representatives in Atlanta as well as Georgia State Bar and Real Estate Commission. **As Licensed Professionals, Pat Goodwin, David Huguenin, Fountain Law, and Shannon Rollins knew perfectly well what immoral, unethical, and illegal activities regarding the sale of real estate they could perpetrate with impunity.**

Furthermore, I believe Georgia State Legislators should pass legislation to compel the Real Estate industry and Attorneys to conduct a cursory background investigation on anyone purchasing real estate for cash in the State of Georgia and to investigate cash sales of real estate to minimize cash from gotten gains of Real Estate. **Maybe they should go one step further and report cash sales to the IRS.**

DANIEL REEVES

CIVIL SUIT

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This lawsuit was filed to protect my property rights and to keep our country and community safe, secure, and free. My complaint is microcosm of the pain being felt by regular Americans who do not have the support of their elected representatives nor do they have support of the local, State, and Federal Government in Washington DC, and Atlanta to ensure veterans as well as all American citizens have first priority to purchase affordable single family housing in this State and throughout the nation.

Lastly, my complaint reveals how unscrupulous Real Estate Agents and Attorneys operate in order to lock veterans, minorities and regular Americans out of the housing market which is unfair, discriminatory and unaffordable.

This is the elephant in the room that no one in power want to address. The actions of these business entities combined with the indifference of those in power will facilitate and contribute to the precipitous downfall of the nation as well as middle class home buyers.

Thank you very much for investigating this matter.

Very Respectfully,

Daniel Reeves
2914 Mock Road Owner
& U.S. Air Force Veteran

CONTINUADO DESDE EL PUNTO II B. 1, PRO SE - BASE DE JURISDICCIÓN

A. El nombre de los demandados es Pat Goodwin de Blanchard y Calhoun Realty y es ciudadana del Estado de Georgia

B. El nombre del Demandado es David Huguenin y es Abogado y ciudadano del Estado de Georgia

C. El nombre de Defendantans Corporation es Fountain Law y esta Corporación se encuentra en North Augusta, Carolina del Sur.

D. El nombre de Defendantans Corporation es Shannon Rollins Real Estate y esta Corporación se encuentra en North Augusta, Carolina del Sur.

CONTINUACIÓN DEL PUNTO III, PRO SE 1 - DECLARACIÓN DE RECLAMACIÓN

Estoy afirmando que Pat Goodwin y David Huguenin engañan, mal informados, mal dirigida y mintió acerca de Ingrid Espina estar disponible para firmar un acuerdo para construir una carretera de acceso en su propiedad en el cierre y para anular la servidumbre en mi propiedad en 2914 Mock Road. Pat Goodwin mintió sobre Ingrid Espina apareciendo en una fecha posterior para firmar un acuerdo cuando no se presentó para el cierre el 28 de abril de 2023.

David Huguenin me evitó para que no tuviera que explicar las complejidades de las servidumbres y el hecho de que él y Pat Goodwin estaban mintiendo sobre Ingrid Espina firmando un acuerdo para construir la carretera de acceso para anular la servidumbre en mi propiedad en 2914 Mock Road. Además, Pat Goodwin y David Huguegnin perpetraron un acaparamiento de tierras de mi propiedad y se lo dieron a Ingrid Espina alegando que Ingrid Espina construiría una carretera de acceso en su propiedad, en 2912 Mock Road para anular la servidumbre en mi propiedad, 2914 Mock Road. La Oficina del Abogado David Hugueninins legalizó el acaparamiento de tierras el 28 de abril de 2023. Pero, el Sr. Huguenin estaba notablemente ausente en esa fecha para reclamar una negación plausible a pesar de que sabía sobre el problema el 7 de marzo de 2023 y me ha evitado desde esa fecha.

Fountain Law cometió errores al cerrar para Ingrid Espina, según lo iterado por Steve Rushing, Abogado. El bufete de abogados Fountain Law no se aseguró de que Ingrid Espina construyera una carretera para su propio uso durante el cierre de 2912 Mock Road el 23 de febrero de 2023. Que yo sepa, Fountain Law Firm tampoco envió mi letter(English and Spanish) a Ingrid Espina ni me comunicaron que la carta fue entregada.

Ahora, Shanon Rollins Realtor(D. Padilla) ofrece vender Dale Reeves 2912 Mock Road para \$86k, que aumentó \$21k de un valor de tasación de \$65k 6 meses antes. Este es un aumento de alrededor del 32% que parece ser el aumento de precios de Bienes Raíces a un Hombre Asiático Bi-Racial que es un Veterano de la Guardia Nacional Aérea de Georgia y EE. Empleado Civil del Ejército.

Pat Goodwin, David Huguenin, Fountain Law y Shannon Rollins Realtor utilizaron el poder de sus oficinas para censurar y evitar discusiones y comunicaciones entre Daniel Reeves, 2914 Dueño de Mock Road e Ingrid Espina, 2912 Dueño de Mock Road en lo que respecta a la firma de acuerdos y para anular la servidumbre en mi propiedad en 2914 Mock Road.

Todas estas entidades no hicieron un esfuerzo de buena fe para garantizar que la servidumbre fuera anulada y que Ingrid Espina firmara acuerdos después del cierre. Tampoco me proporcionaron instrucciones e instrucciones, Daniel Reeves, el Plantífile sobre cómo debo mantener la propiedad hasta que fue ocupada por Ingrid Espina como se indica en mi carta de

CONTINUADO DESDE EL PUNTO II B. 1, PRO SE - BASE DE JURISDICCIÓN

A. El nombre de los demandados es Pat Goodwin de Blanchard y Calhoun Realty y es ciudadana del Estado de Georgia

B. El nombre del Demandado es David Huguenin y es Abogado y ciudadano del Estado de Georgia

C. El nombre de Defendantans Corporation es Fountain Law y esta Corporación se encuentra en North Augusta, Carolina del Sur.

D. El nombre de Defendantans Corporation es Shannon Rollins Real Estate y esta Corporación se encuentra en North Augusta, Carolina del Sur.

CONTINUACIÓN DEL PUNTO III, PRO SE 1 - DECLARACIÓN DE RECLAMACIÓN

Estoy afirmando que Pat Goodwin y David Huguenin engañan, mal informados, mal dirigida y mintió acerca de Ingrid Espina estar disponible para firmar un acuerdo para construir una carretera de acceso en su propiedad en el cierre y para anular la servidumbre en mi propiedad en 2914 Mock Road. Pat Goodwin mintió sobre Ingrid Espina apareciendo en una fecha posterior para firmar un acuerdo cuando no se presentó para el cierre el 28 de abril de 2023.

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Pat Goodwin, David Huguenin, Fountain Law y Shannon Rollins Realtor utilizaron el poder de sus oficinas para censurar y evitar discusiones y comunicaciones entre Daniel Reeves, 2914 Dueño de Mock Road e Ingrid Espina, 2912 Dueño de Mock Road en lo que respecta a la firma de acuerdos y para anular la servidumbre en mi propiedad en 2914 Mock Road.

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junio de 2023 a David Huguenin y Pat Goodwin. Todo esto fue una farsa para hacer una venta. Fue la traición final de mi Agente de Bienes Raíces,

Pat Goodwin y el abogado David Huguenin de un veterano militar que sirvió con honor y distinción. Las acciones de todas estas entidades podrían interpretarse erróneamente como un trato discriminatorio y perjudicial a un veterano anciano con discapacidades específicas incurridas en el servicio y a su familia cultural y racialmente diversa. También percibo que sus acciones son Antiamericanas y Anti-Veteranas.

También, el aumento de precios de Real Estate por Shannon Rollins Real Estate de Dale Reeves podría considerarse discriminación de un Hombre Asiático Bi-Racial. Mi esposa es una inmigrante de Corea del Sur y mi adulta los niños son birraciales. Han sido intimidados y acosados debido a su raza mientras asistían a la escuela k-12 en Georgia del Sur. Mi esposa también fue maltratada en el lugar de trabajo debido a sus patrones de habla y su raza.

Además, buscar justicia por el maltrato y abuso de veteranos y el odio antiasiático es casi imposible debido a que nuestro Gobierno no reconoce los Derechos Civiles de Veteranos y Asiáticos. Los asiáticos son considerados la minoría silenciosa y sistemáticamente perseguidos en todo el país con poco apoyo de las agencias gubernamentales de aplicación de la ley.

Las irregularidades de estas entidades comerciales han hecho metástasis y empeorado durante este período de marzo de 2023 hasta que los Abogados Profesionales de Bienes Raíces y los Agentes de Bienes Raíces con Licencia tienen la culpa. Me han causado lesiones y daños psicológicos, Daniel Reeves, The Plaintiff mientras progresaba en la cinta transportadora de préstamos para el hogar. Este proceso fue muy estresante, lo que me hizo preocuparme (malos sueños) sobre alguien herido mientras atravesaba la servidumbre en mi propiedad y posteriormente fue demandado por el accidente. Esto ha empeorado mi ansiedad y depresión y las pesadillas han regresado como ocurrió cuando estaba en alerta por una amenaza constante de una invasión de Corea del Norte a Corea del Sur.

Además, alego que Pat Goodwin de Blanchard y Calhoun, el abogado David Huguenin y Shannon Rollins Realtor de Augusta, GA, incluirán Fountain Law en North Augusta, SC tal vez culpable de excluir a un Estados Unidos dado de baja honorablemente. Veterano de la Fuerza Aérea y miembros de su familia cultural y racialmente diversa de comunicación legal y autorizada entre vecinos (Daniel Reeves & Ingrid Espina).

Por último, Creo que Ingrid Espina no estaba al tanto de las trampas y consecuencias de no tener su propio camino de acceso en su propiedad y tener que usar mi propiedad en 2914 Mock Road para acceder a la suya residencia. El equipo de cierre (Shannon Rollins y Fountain Law) en el norte de Augusta no explicó completamente las complejidades de tener servidumbre de acceso por carretera sin mejorar en la propiedad de otra persona que podría haber causado lesiones y daños a ambos propietarios, Ingrid Espina y Daniel Reeves.

La Industria de Bienes Raíces y los Abogados están bloqueando a los veteranos (incluidos los Estados Unidos de clase trabajadora y media. Ciudadanos) fuera de la comercialización de la vivienda para aceptar las ventas en efectivo de Bienes Raíces de cualquier persona y todo el mundo para incluir a los traficantes de drogas y personas, MS-13, la Mafia Rusa, etc, miembros del PCCh y la camarilla criminal ubicada en Atlanta. Desafortunadamente, muchos de nuestros políticos en Georgia, la Capital del Estado, probablemente estén vinculados a estas entidades criminales, lo que hace que nuestras comunidades seguras se infesten con más y más actividad criminal. Estas entidades criminales se extenderán por todo el estado de Georgia y harán que nuestras pequeñas comunidades sean como la mía en 2914 Mock Rd (en Augusta menos seguras. Pero el gobierno, los abogados, las corporaciones y la industria del

estado real no están preocupados por la seguridad pública debido a su propia sed siniestra de riqueza, poder y estatus.

También, Las firmas de inversión Anti-American Global como BlackRock Vanguard y Wall Street están devorando bienes raíces a un ritmo acelerado que está desplazando a los veteranos, así como a los estadounidenses trabajadores y de clase media, de viviendas asequibles. Todas estas cosas son traicioneras, discriminatorias e ilegales. Por lo tanto, la clase trabajadora y la clase media no tienen el mismo acceso a viviendas asequibles que pueden violar la 14a Enmienda bajo los Estados Unidos. Constitución que establece que Todas las personas nacidas o naturalizadas en los Estados Unidos, y sujetas a su jurisdicción, son ciudadanos de los Estados Unidos y del estado en el que residen. Ningún estado hará o hará cumplir ninguna ley que restrinja los privilegios o inmunidades de los ciudadanos de los Estados Unidos; ni ningún estado privará a ninguna persona de vida, libertad o PROPIEDAD, sin el debido proceso legal; ni negar a ninguna persona dentro de su jurisdicción la igual protección de las leyes.

Yo, Daniel Reeves, por lo tanto, someta al tribunal que una Empresa Privada no debe ser considerada una persona y que las familias como la mía deben tener la máxima prioridad para invertir en propiedad privada y vivienda unifamiliar como no podemos competir con las ventas en efectivo de Wall Street, Corporaciones Multinacionales, Empresas de inversión para incluir entidades criminales y extranjeras que cuentan con el apoyo de abogados con licencia. Creo que la intención original de la ley era crecer y sostener a la clase media estadounidense y no aumentar la riqueza de las corporaciones multinacionales ultra ricas. Estas Corporaciones Multinacionales con su ejército de abogados están bloqueando a los veteranos, minorías y estadounidenses de clase media de comprar viviendas asequibles. Identificar erróneamente a una Corporación como persona es contrario al propósito y la intención de la 14a enmienda bajo los Estados Unidos. Constitución.

Como Estados Unidos. Veterano de la Fuerza Aérea, lIM pidiendo una compensación para mí y mi familia por maltrato, abuso, etc, y el desprecio total de todos los acusados, ya que he dedicado 34 años de mi servicio vital para servir en el servicio militar y federal para proteger y defender a los Estados Unidos. Constitución y no ser maltratado por mi propio pueblo(U.S. Citizens) en la industria inmobiliaria.

por un mínimo de \$250k para compensar la hospitalización, el dolor y el sufrimiento a mi vecino. Además, el camino de servidumbre de acceso en mi propiedad no está mejorado y en una pendiente pronunciada que aumenta el potencial de accidentes para cualquier persona que atravesase este camino para acceder a la residencia de remolque ancha única en la parte superior de la colina.

Un Agente de Bienes Raíces Profesional con Licencia y un Abogado Profesional con Licencia tenían el conocimiento, las habilidades y las habilidades para estar muy al tanto de estos sucesos, pero no hicieron nada para ayudar a explicar esto a ambos propietarios, Daniel Reeves e Ingrid Espina y a la dueña original, Millie Moore. Cabe señalar que Daniel Reeves es un anciano discapacitado de los Estados Unidos. Veterana de la Fuerza Aérea, Millie Moore es hispana, e Ingrid es hispana que no habla inglés. Todos somos clases protegidas de ciudadanos y fuimos engañados por todos los acusados enumerados en esta queja. Esto podría interpretarse erróneamente como un trato discriminatorio y perjudicial para las minorías, así como para los veteranos discapacitados mayores que están casados con inmigrantes naturalizados de Corea del Sur. Además, los acusados no intentaron mitigar el problema reuniéndonos para que Ingrid Espina firmara un acuerdo para construir una carretera de acceso y firmara una liberación de responsabilidad. De hecho, hicieron exactamente lo contrario. Hicieron todo lo posible para evitar que Ingrid Espina y yo nos comunicáramos.

Después de presentar quejas ante la Comisión de Bienes Raíces de Georgia y el Colegio de Abogados del Estado, Finalmente me informaron que Ingrid Espina quería vender la propiedad en 2912 Mock Road que no tiene una carretera de acceso para uso propio, sino que usa mi propiedad en 2914 Mock Rd para acceder al único remolque ancho en la cima de la colina. La servidumbre de acceso por carretera de mi propiedad no está mejorada y tiene una pendiente pronunciada.

Durante los últimos 6 meses, la propiedad y la servidumbre parecían estar abandonadas. Desde mi propiedad de 2914 Mock Road, he estado manteniendo la servidumbre y una parte de 2912 Mock, propiedad de Ingrid Espina, cortando hierba y recogiendo extremidades. La servidumbre se ha cerrado y yo he sido el único que la usa y la mantiene. Creo que David Huguenin y Pat Goodwin sabían que Ingrid Espina no se mudaría aquí, pero me estafaron haciéndome creer que lo haría y que estaría disponible para el cierre del 28 de abril de 2023. Pero, de repente, las cosas cambiaron justo antes del cierre e Ingrid Espina se mudó a 2912 Mock Road se retrasó por razones desconocidas.

¡Pero, creo que todo esto fue ideado para hacer una venta! Incluso Millie Moore, propietaria original que vendió ambas propiedades a Ingrid y yo sabía que algo no estaba bien. Ella creía que Ingrid Espina no residiría en 2912 Mock Road por mucho tiempo o nada en absoluto. Estoy seguro de que todos (Real Estate Agents and Attorneys) involucrados también lo sabían. Sí, Shannon Rollins ofreció vender 2912 Mock Road a mi hijo, Dale Reeves por un precio inflado de \$86K que es \$21K sobre el precio de tasación de \$65k hace 6 meses cuando Pat Goodwin David Huguenin perpetró un acaparamiento de tierras que se me dio Ingrid Espina durante el proceso de negociación. Todo en este país está inflado para incluir viviendas que dificultarán que la mayoría de los estadounidenses trabajadores y de clase media lleguen a fin de mes. El estado actual de la economía eventualmente los empujará a ellos, así como a mi familia, a un estado de desesperación y empobrecimiento debido a un mercado inmobiliario injusto, discriminatorio y caro.

Después de todas las travesuras fomentadas y respaldadas por Agentes y Abogados de Bienes Raíces, \$300k es una solicitud razonable. Esto me compensará un poco por la forma en que el Complejo Industrial Inmobiliario incluye el cierre de abogados que realizan negocios. Debido a su modelo de negocio, Los agentes inmobiliarios no reciben pago a menos que realicen una venta y hay poco interés en que sepan quién (los rastreadores de drogas y humanos o los inmigrantes ilegales) a quienes venden a (Money es el único lo que importa en este business) que llevará a que más personas de países extranjeros tomen el lugar de ciudadanos estadounidenses y veteranos como yo. También forzará el precio de la vivienda al alza sin un final a la vista.

Además, hay un flujo libre de dinero de gobiernos extranjeros en todo el estado que están involucrados en actividades criminales obtenidas del tráfico de personas y drogas y otras actividades ilegales. El libre flujo de dinero de la actividad criminal está componiendo cada vez más de la economía en este estado porque el Gobernador, el Colegio de Abogados del Estado, la Comisión de Bienes Raíces de Georgia y otros negocios corporativos solo se preocupan por la economía, ya sea legal de ilegal (y su propio interés en lugar de trabajar para los ciudadanos de Georgia para garantizar que tengan precios asequibles vivienda).

Cabe señalar que el camino de servidumbre de acceso originalmente estaba destinado a acomodar a un miembro de la familia del propietario original, Millie Moore y no para personas que no eran miembros de la familia de ambas propiedades, 2912 y 2914 Mock Road. Ahora, esto está causando posibles disputas de propiedad entre Ingrid Espina y Daniel Reeves debido a la Real Estate Industries (Blanchard y Calhoun en Augusta) codicia por las ganancias. Pat Goodwin, David Huguenin, Fountain Law y Shannon Realty colocaron su propio interés por delante del interés de Daniel Reeves, Ingrid Espina, y Millie Moore que eran y son propietarios

privados y también son clases protegidas de ciudadanos(Hispano, Bi-Racial Asiático y ancianos Discapacitados Veteran).

Además, La venta de Bienes Raíces al elemento criminal se lleva a cabo todos los días en Georgia(y en todo el país) para acomodar la transformación expedita e inmediata de Estados Unidos que cuenta con el apoyo de los políticos estadounidenses y Gobierno/Instituciones Corporativas en Atlanta.

Para proteger a familias como la mía, Creo que los legisladores estatales deben aprobar una ley que no permita la venta de bienes raíces con este tipo de servidumbre de acceso por carretera(cientos de pies de largo)cundo la propiedad adyacente tiene disponible land(Flagpole Property) para construir un camino para su propio acceso(platt indica evidencia verificable) Esto indica negligencia por parte de Agentes y Abogados de Bienes Raíces que parece estar respaldada por Representantes electos en Atlanta, así como Georgia State Bar y la Comisión de Bienes Raíces. Como Profesionales Licenciados, Pat Goodwin, David Huguenin, Fountain Law y Shannon Rollins sabían perfectamente qué actividades inmorales, poco éticas e ilegales con respecto a la venta de bienes raíces podían perpetrar con impunidad.

Además, Creo que los Legisladores del Estado de Georgia deben aprobar una legislación para obligar a la industria de Bienes Raíces y a los Abogados a realizar investigaciones de antecedentes superficiales sobre cualquier persona que compre bienes raíces por dinero en efectivo en el Estado de Georgia y investigar las ventas en efectivo de bienes raíces para minimizar el efectivo de las ganancias obtenidas de Bienes Raíces. Tal vez deberían ir un paso más allá e informar las ventas en efectivo al IRS.

Esta demanda fue presentada para proteger mis derechos de propiedad y para mantener a nuestro país y comunidad seguros y libres. Mi queja es el microcosmos del dolor que sienten los estadounidenses regulares que no cuentan con el apoyo de sus representantes electos ni tienen el apoyo del Estado local, y el Gobierno Federal en Washington DC, y Atlanta para garantizar que los veteranos, así como todos los ciudadanos estadounidenses, tengan la primera prioridad de comprar viviendas unifamiliares asequibles en este Estado y en todo el país.

Por último, mi queja revela cómo operan los Agentes y Abogados de Bienes Raíces sin escrúpulos para bloquear a los veteranos, las minorías y los estadounidenses habituales fuera del mercado inmobiliario, lo cual es injusto, discriminatorio e inasequible.

Este es el elefante en la habitación que nadie en el poder quiere abordar. Las acciones de estas entidades comerciales combinadas con la indiferencia de los que están en el poder facilitarán y contribuirán a la caída precipitada de la nación, así como a los compradores de viviendas de clase media.

Muchas gracias por investigar este asunto.

Muy Respetuosamente,

Daniel Reeves
2914 Propietario de Mock Road
& Y ESTADOS UNIDOS. Veterano de la Fuerza Aérea

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Daniel Reeves

(b) County of Residence of First Listed Plaintiff Richmond

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

DEFENDANTS

Pat Goodwin Real Estate Agent, David Huguenin Attorney,
Shannon Rollins Realtor(D Padilla) and Fountain Law FirmCounty of Residence of First Listed Defendant Columbia

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

CV123-0131

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|---------------------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input checked="" type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input checked="" type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education PRISONER PETITIONS <input type="checkbox"/> Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
Property Rights. Requested exclusive rights to my property located at 2914 Mock Road.

Brief description of cause:

Defendants failed to uphold negotiated agreements to have 2912 Mock Rd property owner construct access road and nullify easement.

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.DEMAND \$
300,000CHECK YES only if demanded in complaint:
JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE The Honorable Brian K. Epps

DOCKET NUMBER CV123-076

DATE

9-06-2023

SIGNATURE OF ATTORNEY OF RECORD

PRO SE LITIGANT

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44**Authority For Civil Cover Sheet**

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
 - (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
 - (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; NOTE: federal question actions take precedence over diversity cases.)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
 Original Proceedings. (1) Cases which originate in the United States district courts.
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.


Date and Attorney Signature. Date and sign the civil cover sheet.

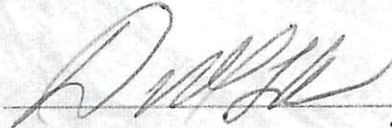
DANIEL REEVES 1/09
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AUGUSTA, GA 30904-4208

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